PHILIP MORRIS INCORPORATED
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100 Park Avenue, New York, N.Y. 10017

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A. H.

To: . Please see below

Date: November 13, 1981

From: . Fredric S. Newman

Subject: . Response to FTC Staff Report on Cigarette Advertising

Here is a revised draft of the industry response to the FTC Staff Report on Cigarette Advertising. It incorporates virtually all the Philip Morris comments that were made concerning the October 1 draft. The changes are highlighted in the two-page covering memorandum from Covington & Burling dated November 10.

Any additional comments will be received through next Friday, November 20.

At this point, however, the response seems fairly well written, and our focus should be upon the question whether or not the response should be submitted. In this regard, you may be interested to know that the American Cancer Society has indicated that it will be filing support for the FTC's position. We may also expect comments from antismoking groups in the next few weeks. The comment period ends approximately December 8, 1981.

Fred

tg
Attachments
cc: A. Holtzman, Esq.

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